

1 BRUCE C. YOUNG, ESQ., NV Bar # 5560  
PAIGE S. SHREVE, ESQ., NV Bar # 13773  
2 JOSH COLE AICKLEN, ESQ., NV Bar # 7254  
LEWIS BRISBOIS BISGAARD & SMITH LLP  
3 6385 S. Rainbow Boulevard, Suite 600  
Las Vegas, Nevada 89118  
4 TEL: 702.893.3383  
FAX: 702.893.3789  
5 [Bruce.Young@lewisbrisbois.com](mailto:Bruce.Young@lewisbrisbois.com)  
[Paige.Shreve@lewisbrisbois.com](mailto:Paige.Shreve@lewisbrisbois.com)  
6 *Attorneys for Defendant*  
BTO INVESTMENTS, INC.  
7

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA  
10

11 HOLLY MARIE WOOD, an individual,

12 Plaintiff,

13 vs.

14 CARL'S JR., operated and owned by BTO  
INVESTMENTS, a Delaware corporation; S.L.  
15 INVESTMENTS, a Nevada corporation; CKE  
RESTAURANTS, INC., a Delaware  
16 corporation; CARL'S JR. RESTAURANTS,  
LLC, a foreign limited liability company;  
17 CARL KARCHER ENTERPRISES, INC., a  
foreign corporation; CKE RESTAURANTS  
18 HOLDINGS, INC., a foreign corporation;  
RUCEY MOLINA CRUZ, an individual;  
19 DOES 1 through 10, inclusive; ROE  
CORPORATIONS/ENTITIES 1 through 10,  
20 inclusive;

21 Defendants.  
22

CASE NO. 2-20-cv-02329-APG-BNW

**STIPULATION AND [PROPOSED]  
ORDER FOR EXTENSION OF TIME  
FOR DEFENDANT BTO INVESTMENTS,  
INC. TO ANSWER OR OTHERWISE  
RESPOND TO PLAINTIFF'S  
COMPLAINT**

**[FIRST REQUEST]**

23 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff HOLLY  
24 MARIE WOOD ("Plaintiff") and Defendant BTO INVESTMENTS, INC. ("Defendant" or  
25 "BTO"), by and through their respective counsel of record Paul S. Padda of PAUL PADDALAW,  
26 PLLC, and Bruce C. Young, Esq. of the law firm LEWIS BRISBOIS BISGAARD & SMITH  
27 LLP, as follows:

28 . . .

Counsel for BTO has only recently been retained to represent BTO in this matter. In light of the holiday season and COVID-19 issues, as well as the number of allegations and claims set forth in the Complaint, the parties agree that an extension of time for BTO to answer or otherwise respond to the Complaint is necessary and appropriate. In order to allow counsel for Defendant sufficient time to investigate the facts and prepare an appropriate response to the Complaint, the Parties have agreed to stipulate to extend the time for Defendant to respond to Plaintiff's Complaint up to and including January 15, 2021. This extension is not sought for any improper reason or for the purpose of delay.

DATED this 8th day of January, 2021.

DATED this 8th day of January, 2021.

LEWIS BRISBOIS BISGAARD & SMITH LLP

PAUL PADDA LAW, PLLC.

By /s/ Bruce C. Young, Esq.

By /s/ Paul S. Padda

Bruce C. Young, Esq.

Paul S. Padda, Esq.

Paige S. Shreve, Esq.

Anthony L. Abbatangelo, Esq.

6385 S. Rainbow Boulevard, Suite 600

PAUL PADDA LAW, PLLC

Las Vegas, Nevada 89118

610 South Ninth Street

Attorneys for Defendants

4560 South Decatur Boulevard, Suite 300

BTO Investments Inc.

Las Vegas, NV 89103

Attorneys for Plaintiff

### **[PROPOSED] ORDER**

Pursuant to the Stipulation of the Parties, and good cause appearing therefore:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Defendant BTO INVESTMENTS, INC's response to Plaintiff's Complaint shall be filed on or before January 15, 2021.

**IT IS SO ORDERED**

**DATED:** 11:40 am, January 20, 2021

**BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE**